

MILMAN LABUDA LAW GROUP PLLC
3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NEW YORK 11042


TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

Author: Netanel Newberger
Author's E-Mail Address: netanelnewberger@mlaborlaw.com
Direct Dial: (516) 303-1356

November 27, 2019

Via ECF

Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 518
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 12/2/2019

Re: Recycling and General Industrial Union Local 108 Welfare Fund et al. v. Donato Marangi, Inc. et al.
Index No.: 1:19-CV-04429 (VSB)
MLLG File No.: 123-2019

Dear Judge Broderick:

This law firm represents Defendants Donato Marangi, Inc.; Cottage Carting Inc., each doing business as Marangi Disposal and Marangi Disposal Div. CC. Inc.; and Dominick Marangi Sr., Michael Marangi, and Dominick Marangi Jr., each individually (collectively, "Defendants") in the above-referenced matter. The parties jointly respectfully request an extension of time until December 4, 2019 to submit the joint letter, proposed case management plan and scheduling order (collectively, "joint letter"). In accordance with the Court's individual rules, the following information is provided: (1) The original date for the submission of the joint letter is December 2, 2019; (2) there were two (2) prior requests for an extension of time to submit the joint letter, both in connection with Defendants' prior requests to adjourn the initial conference; (3) the prior requests were granted; (4) this is a joint request; and (5) the reason for the request is that the parties are actively finalizing a settlement in principal and expect to be able to do so shortly. This request does not affect any other scheduled deadline or court appearance. Thank you for your attention to this matter.

Respectfully submitted,

MILMAN LABUDA LAW GROUP, PLLC

/s/ Netanel Newberger, Esq.
Netanel Newberger, Esq.

cc: All counsel of record (via ECF)